

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR  
MANUFACTURING, ALABAMA,  
LLC; HYUNDAI ENG AMERICA,  
INC.; and DYNAMIC SECURITY,  
INC.

Defendants.

Case No. 2:19-CV-767-ECM

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**EXHIBIT “A” TO**

**PLAINTIFF’S OBJECTIONS TO HYUNDAI ENG AMERICA’S  
DEPOSITION DESIGNATIONS**

**CASSANDRA WILLIAMS**

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Case	Key, Davita
Issue Code	HEA Designation

WILLIAMS, CASSANDRA 9/6/22 VOL 1			
1	015:18 - 015:18	015:18	MR. MILLER: Object to form.
2	033:07 - 033:07	033:07	MR. MILLER: Object to form.
3	034:12 - 034:12	034:12	MR. MILLER: Object to form.
4	035:12 - 035:12	035:12	MR. MILLER: Object to form.
5	036:08 - 036:08	036:08	MR. MILLER: Object to form.
6	037:13 - 037:13	037:13	MR. MILLER: Object to form.
7	041:07 - 041:07	041:07	MR. MILLER: Let me object to form.
8	044:15 - 044:15	044:15	MR. MILLER: Object to form.
9	045:17 - 045:17	045:17	MR. MILLER: Object to form.
10	046:02 - 046:02	046:02	MR. MILLER: Object to form.
11	048:05 - 048:05	048:05	MR. MILLER: Object to form.
12	048:17 - 048:17	048:17	MR. MILLER: Object to form.
13	049:13 - 049:13	049:13	MR. MILLER: Object to form.
14	049:18 - 049:18	049:18	MR. MILLER: Object to form.
15	050:04 - 050:04	050:04	MR. MILLER: Object to form.
16	051:10 - 051:23	051:10	Q. What was Ms. Howard's race?
		11	A. Black.
		12	Q. An what was Ms. Walton's race?
		13	A. Miss who?
		14	Q. Walton.
		15	A. Black.
		16	Q. Is there still an "Appearance Standards
		17	for Security Personnel" policy?
		18	A. Yes.
		19	Q. And under that are dreads or dreadlocks
		20	prohibited for women?
		21	A. Yes. For women?
		22	Q. Yes.
		23	A. For all.
17	052:04 - 052:04	052:04	MR. MILLER: Object to form.
18	055:13 - 055:13	055:13	MR. MILLER: Object to form.
19	055:21 - 055:21	055:21	MR. MILLER: Object to form.

20	056:05 - 056:05	056:05	MR. MILLER: Object to form.
21	056:10 - 056:10	056:10	MR. MILLER: Object to form.
22	066:18 - 066:18	066:18	MR. MILLER: Object to form.
23	069:16 - 069:16	069:16	MR. MILLER: Object to form.
24	070:17 - 070:17	070:17	MR. MILLER: Object to form.
25	071:01 - 071:05	071:01 Q. So you always wear a shirt that says 02 "Hyundai Engineering"? 03 A. Yes. 04 Q. Was that the case in 2017? 05 A. Yes.	
26	076:04 - 076:04	076:04	MR. MILLER: Object to form.
27	076:07 - 076:13	076:07 Q. Okay. Other than what you explained about 08 keeping a close eye on the mail room or you 09 filling in if there was a need, what else, if 10 anything, did you do to provide indirect 11 supervision? 12 MR. MILLER: Object to form. 13 A. That's basically it.	
28	076:22 - 076:22	076:22	MR. MILLER: Object to form.
29	077:21 - 077:21	077:21	MR. MILLER: Object to form.
30	080:13 - 080:13	080:13	MR. MILLER: Object to form.
31	083:05 - 083:05	083:05	MR. MILLER: Object to form.
32	083:11 - 083:11	083:11	MR. MILLER: Object to form.
33	083:22 - 083:22	083:22	MR. MILLER: Object to form.
34	084:10 - 084:19	084:10 Q. Okay. You said an agreement was reached. 11 Were you a party to this agreement 12 concerning how Ms. Key would style her hair? 13 A. Yes. I was in there when she agreed to do 14 it. 15 Q. Tell me what you know of that agreement. 16 A. It was a verbal agreement. She stated -- 17 after I said "Yes, this is acceptable" and she 18 stated that's the way she would have her hair done 19 when she returned.	
35	085:11 - 085:13	085:11 Q. Okay. And how much time passed between 12 the date of her interview and her start date? 13 A. Maybe two or three weeks.	
36	087:09 - 087:09	087:09	MR. MILLER: Object to form.

37	093:14 - 093:14	093:14	MR. MILLER: Object to form.
38	096:12 - 096:12	096:12	MR. MILLER: Object to the form.
39	101:17 - 101:21	101:17 18 19 20 21	MR. MILLER: I'm going to object to questions regarding pregnancy because that is not a claim against HEA. And if you'll agree to let me have a standing objections on those questions, I won't continue to interrupt you.
40	106:15 - 106:15	106:15	MR. MILLER: Object to form.
41	111:06 - 111:06	111:06	MR. MILLER: Object to the form.
42	112:12 - 112:12	112:12	MR. MILLER: Object to the form.
43	118:08 - 118:08	118:08	MR. MILLER: Object to form.
44	118:18 - 118:18	118:18	MR. MILLER: Object to form.
45	119:01 - 119:01	119:01	MR. MILLER: Object to form.
46	134:23 - 135:07	134:23  135:01 02 03 04 05 06 07	Q. Okay. Do you know who replaced Ms. Key in ALABAMA COURT REPORTING, INC.  www.alabamareporting.com 877.478.DEPO (3376) the mail room after she was reassigned? A. I do, but her name escapes me right now. Q. Do you remember if the -- I'm assuming it was a lady that replaced Ms. Key? A. It was. Q. Okay. And what was her race? A. Black.
47	135:19 - 136:11	135:19 20 21 22 23  136:01 02 03 04 05 06 07 08 09 10	Q. Do you know why that is? A. To differentiate the regular post office from the mail room. Q. Did Ms. Key perform any security work at HMMA?  ALABAMA COURT REPORTING, INC.  www.alabamareporting.com 877.478.DEPO (3376) MR. MILLER: Object to form. A. So part of her duties is to secure the mail room. Q. And what do you mean by "secure the mail room"? A. To ensure that the packages -- nothing leaves the mail room that is not supposed to, nobody comes into the mail room that shouldn't be in there to get packages. They're responsible for everything that's in the mail room.

		11 Q. Okay.
48	146:17 - 147:09	<p>146:17 I think you mentioned earlier you that</p> <p>18 formerly worked for the City of Montgomery Police</p> <p>19 Department; is that correct?</p> <p>20 A. It is.</p> <p>21 Q. And when you worked for the City of</p> <p>22 Montgomery Police Department, did they allow</p> <p>23 dreadlocked hair styles?</p> <p>ALABAMA COURT REPORTING, INC.</p> <p>www.alabamareporting.com 877.478.DEPO (3376)</p> <p>147:01 A. They did not.</p> <p>02 Q. Did any HMMA employee ever tell you that</p> <p>03 HMMA had an issue with black people wearing</p> <p>04 dreadlocked hairstyles?</p> <p>05 A. I never heard that. It was never told to</p> <p>06 me.</p> <p>07 Q. Would you have had an issue with that if</p> <p>08 someone told you that?</p> <p>09 A. I would have.</p>
49	151:21 - 151:21	151:21 MR. MILLER: Object to form.
50	152:05 - 152:05	152:05 MR. MILLER: Object to the form.
51	152:21 - 152:21	152:21 MR. MILLER: Object to the form.